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The Honorable Frank Maas
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 740
New York, NY 10007

BY ECF AND FACSIMILE TO (212) 805-6724 – CORRECTED VERSION

Re: *In re Terrorist Attacks on September 11, 2001*, No. 1:03-md-01570-GBD-FM

Dear Judge Maas:

We write on behalf of defendant Dallah Avco to request a further extension of time for its response to plaintiffs' motion to compel (Dkt. 3211), currently due April 29, 2016, to May 30, 2016. Undersigned counsel learned earlier today that Abdullah Yamani, the general counsel of Dallah Avco's parent company who has been responsible for Dallah Avco's defense of this case, was admitted to the hospital with a serious medical condition and may not be available for the next two weeks. Because Dallah Avco planned that Mr. Yamani would submit a declaration in support of its opposition detailing the steps Dallah Avco has taken to comply with its discovery obligations, this unexpected emergency makes it impossible for Dallah Avco to meet the existing deadline. Accordingly, Dallah Avco respectfully requests that the deadline be extended by 31 days to Monday, May 30, 2016. This is Dallah Avco's second request for an extension of this deadline; the Court granted its previous request. *See* Dkts. 3213 & 3214.

Plaintiffs have advised that they consent to this extension. Thank you for your time and attention to this matter.

Respectfully submitted,



Robert Kry

cc: all counsel by ECF